



International Bureau

Federal Communications Commission
Washington, DC 20554

May 3, 2012

Walter H. Sonnenfeldt
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Stephen L. Goodman, Esq.
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1747 Pennsylvania Ave., NW, Suite 300
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Re: Modification Application of Orbcomm License Corp.
IBFS File No. SAT-MOD-20111021-00207
Call Sign: S2103

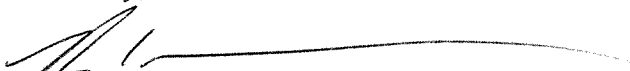
Dear Mr. Sonnenfeldt and Mr. Goodman:

On October 21, 2011, Orbcomm License Corp. (Orbcomm) filed the referenced application to modify the license for Orbcomm's non-voice, non-geostationary, low-Earth orbit satellites. On December 6, 2011, the Satellite Division requested that Orbcomm file a supplement by to address questions regarding orbital debris issues. On January 18, 2012, the Satellite Policy Branch granted Orbcomm an extension of time to respond, to March 5, 2012. On that date, Orbcomm requested a further extension of time, to June 5, 2012, to supplement and amend its modification application.

We deny the request for further extension. In its request, Orbcomm claims that its deployment plans have changed and it has not yet been able to finalize a revised deployment plan for its new satellites in sufficient detail to prepare an amendment to the pending modification application. We find this explanation irrelevant to the questions asked in the Division's letter. The three questions in that letter concern: (1) the quantity of fuel in the fuel tank on Orbcomm's proposed satellites at end of life; (2) the risk of a potential re-connection scenario following end of life; and (3) the risks attendant with Orbcomm's plan to operate its next generation satellites at an inclination of 51.6 degrees, the same inclination as the International Space Station. These questions can be answered for Orbcomm's next generation satellites regardless of the timing or means of their deployment.

Accordingly, pursuant to Section 25.111(a) of the Commission's rules,¹ and Section 0.261 of the Commission's rules on delegations of authority,² your request for further extension of time is denied, and we require the supplementation of Orbcomm License Corp.'s modification application within 15 days of the date of this letter, with responses to the questions in the Satellite Division's December 6, 2011 letter. Failure to respond in that time period may lead to dismissal of the modification application.³

Sincerely,



Robert G. Nelson
Chief, Satellite Division
International Bureau

¹ 47 C.F.R § 25.111(a).

² 47 C.F.R § 0.261.

³ 47 C.F.R. § 25.112(c).